

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

In re: : Case No. **15-14249**  
Chapter 13  
**Hope Harper** :  
Debtor. : Judge Jeffery P. Hopkins  
: **MOTION TO VACATE ORDER**  
: **DIRECTING EMPLOYER TO MAKE**  
**WAGE DEDUCTIONS**

Now comes the Debtor, by and through counsel, and respectfully moves the Court for an Order to Vacate the Payroll Deduction Order (Doc. 20), entered on December 3, 2015.

1. Debtor now has reduced hours with this employer which will not cover the amount of the Plan payment.
2. A new Payroll Order with Debtor's new full-time employer is being uploaded contemporaneously with this Motion.

WHEREFORE, Debtor prays for an Order Granting Motion to Vacate Payroll Deduction Order (Doc. 20), and for such additional or alternative relief may be just and proper.

**/s/ Eric A. Steiden**

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UNITED STATES BANKRUPTCY COURT - SOUTHERN DISTRICT OF OHIO, WESTERN  
DIVISION

In re: : Case No. **15-14249**  
**Hope Harper** : Chapter 13  
Debtors. :  
Judge Jeffery P. Hopkins

**NOTICE OF MOTION**

Debtor has filed with the Court a Motion to Vacate Payroll Deduction Order.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to grant or allow the relief sought in the motion, or if you want the Court to consider your views on the motion, then on or before **twenty-one (21) days** from the date set forth in the certificate of service for the motion/objection, **or within such shorter time period as the Court may order**, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to: U.S. Bankruptcy Court, 221 East Fourth Street, Eighth Floor, Cincinnati, OH 45202, or your attorney must file a response using the court's ECF System.

The court must receive your response on or before the above date. You must also send a copy of your response either by 1) the court's ECF System or by 2) regular U.S. Mail to:

STEIDEN LAW OFFICES  
411 Madison Avenue  
Covington, KY 41011

Hope Harper  
9350 Marker Drive  
Cincinnati, OH 45251

U.S. Trustee  
36 East Seventh Street, Suite 2030  
Cincinnati, OH 45202

Margaret A. Burks, Trustee  
600 Vine Street #2200  
Cincinnati, OH 45202

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion/objection and may enter an order granting that relief without further hearing or notice.

Date of service: **December 8, 2015**

**/s/ Eric A. Steiden**

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**CERTIFICATE OF SERVICE**

I hereby certify that, on **December 8, 2015**, a copy of the foregoing Motion to Vacate Order Directing Employer to Make Wage Deductions was served on the following registered ECF participants, electronically through the Court's ECF System at the email address registered with the Court:

U.S. Trustee  
Margaret A. Burks, Chapter 13 Trustee

and on the following by ordinary U.S. mail addressed to:

Hope Harper, 9350 Marker Drive, Cincinnati, OH 45251  
Limited Stores, LLC, 7775 Walton Parkway, New Albany, OH 43054

**/s/ Eric A. Steiden**

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